

## IDAHO CONSUMER-OWNED UTILITIES ASSOCIATION

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September 9, 2005

*via: email*

Steve Wright  
Administrator  
Bonneville Power Administration  
P.O. Box 3621  
Portland OR 97208-3621

Subject: ICUA Comments on Grid West/ TIG

Dear Steve:

The Idaho Consumer Owned Utilities Association (ICUA) wishes to briefly comment on the Bonneville Power Administration's upcoming decision on whether to pursue further development of Grid West, or alternatively, the Transmission Improvements Group (TIG) proposed solution. As a preliminary matter it is important to note that ICUA has yet to adopt a formal position supporting or opposing either of these two transmission proposals.

ICUA's mission statement includes a deferral to other organizations ably representing ICUA members on regionally related issues. Most notably this includes the Northwest Requirements Utilities (NRU), PNGC Power and the Idaho Energy Authority (IDEA); an ICUA "sister" organization. By this letter ICUA acknowledges the comments of NRU and PNGC as they speak for their respective ICUA members. ICUA also specifically incorporates herein as its own the comments of IDEA separately transmitted to you by IDEA's President, Jim Webb, of Lower Valley Energy.

ICUA's ultimate transmission concerns – whether answered by Grid West or TIG – remain best described by paragraph 7(a) of the recently signed GTA Agreement calling for transmission service to GTA customers that is "comparable to the service that BPA provides to its customers that are directly connected to the Federal Columbia River Transmission System." Comparability remains illusive, at least on this side of the mountains. As proposed, neither TIG nor Grid West delivers transmission comparability to the eastern frontier.


BPA power flows to ICUA members over the transmission systems of Idaho Power, PacifiCorp and Avista. With BPA fully subscribed and the onus of resource acquisition residing primarily with the load serving utility, GTA customers need an ever increasing degree of "comparable" access to wholesale markets; not just federal markets. Pancaked access through Idaho IOUs to non-federal power is not "comparable" wholesale market access.

You are right in observing that the transmission status quo is not an option, going forward. Whatever the solution – Grid West, TIG or something new or even incremental<sup>1</sup> -- it needs to be region-wide and all encompassing. While much is yet to be understood of the TIG proposal, at this point, Grid West ‘gets the nod’ when evaluating the “inclusion” factor. Both proposals need more clarity and designated relief regarding rate pancaking for GTA customers.

Thank you for this opportunity to provide these comments. If ICUA can be of further assistance, please do not hesitate to contact either of us at the phone numbers listed below.

Sincerely,

Ronald L. Williams



ICUA Executive Director  
208-344-6633

Jay G. Eimers



ICUA President  
208-983-1610

c: ICUA Board

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<sup>1</sup> Such as initiation of the second phase of the GTA Contract negotiations addressing the thorny issue of non-federal power delivery over the GTAs.